

This is Exhibit G of
the Affidavit of Lindsay Lorimer
sworn February 15, 2002



A commissioner, etc

ROCHON GENOVA is a cutting-edge litigation firm based in Toronto. Founded by **Joel Rochon** and **Vincent Genova**, the firm is committed to providing quality service and excellent results for plaintiffs in various litigation matters including personal injury, medical malpractice, commercial disputes and class actions.

The firm also offers legal advice in family, immigration, criminal and estate matters. Our lawyers, **Frank Felkai, Q.C.** and **Peter Ivanyi** provide first-rate, personalized service in these areas.

Our reputation as one of Canada's leading plaintiffs' firms in consumer and investor **class actions** continues to grow with each of our victories. Recently, we succeeded in certifying a **defective diet drugs class action** against a giant French pharmaceutical corporation. We are the first law firm in Canada to certify an **antitrust class action for price-fixing**. We also recently won a huge legal victory in our **fire-safe cigarettes class action** against the tobacco industry by defeating a Rule 21 motion brought against our clients.

Currently, some of our class actions include:

- Defective products – diet drugs, cholesterol-lowering drugs, heartburn drugs, polybutelane piping
- Dangerous products - failure to manufacture fire-safe cigarettes
- Antitrust – price-fixing of iron oxide
- Insurance - “vanishing” insurance premiums
- Government and health care - institutional abuse

In further groundbreaking developments, our lawyer, **Douglas Lennox**, recently argued the first-ever trial in Ontario against the tobacco industry. He also brought a constitutional challenge against the Ontario government for their refusal to allow contingency fees, thereby denying access to justice to thousands of Ontario citizens. Our firm is single-mindedly committed to pursuing justice on behalf of our clients.

Rochon Genova is very proud to be associated with the pre-eminent American plaintiffs' law firm **Lieff, Cabraser, Heilmann & Bernstein, LLP**. Please visit their web site for more information on class actions in the United States.

JOEL ROCHON is a founding partner of the law firm Rochon Genova in Toronto. Joel graduated with an LL.B. from the Université de Moncton, Faculty of Law in French in 1986. He was admitted to the Ontario Bar in 1988. He practiced for several years at a Toronto litigation boutique firm as an insurance and commercial litigator with a focus on banking litigation.

Joel began working on class action law suits while still at a traditional litigation firm. He soon realized that a special kind of firm was needed to pursue litigation and class actions in any meaningful way, so he and his partner, Vincent Genova, established the firm Rochon Genova in 1999. The firm is committed to get access to justice for all Canadians and is at the forefront of class action litigation in Canada.

Joel continues his practice as a commercial litigator and has now developed an exciting practice representing plaintiffs in class actions and product liability matters. Some of these class actions include: defective diet drugs, anti-cholesterol drugs, heartburn drugs, "vanishing" insurance premiums, price fixing, polybutylene pipes, mercury amalgam fillings, inmate institutional abuse and personal injury and property loss claims against the tobacco industry.

Joel has co-authored two books: *Interlocutory Proceedings - Strategy and Practice*, including a chapter on class action litigation, and *The Emotional Consequences of Personal Injury - A Handbook for Psychiatrists and Lawyers*. He is a regular speaker on product liability and class action litigation at seminars and conferences.

Joel is fluent in English and French.

VINCENT GENOVA is a founding partner of the law firm Rochon Genova in Toronto. He graduated with an Honours Bachelor of Arts degree in Criminology and Sociology from the University of Toronto in 1984. He received an LL.B. from the University of Western Ontario Toronto in 1987 and was called to the Bar in 1989.

Vincent's main practice is litigation including class actions, municipal, hospital, automobile and other insurance law, with his primary focus on personal injury litigation. Vincent mainly represents plaintiffs, but has experience as both defence and plaintiff's counsel.

Vincent has presented papers on insurance issues to the Canadian Life & Health Insurance Association annual claims conference among others and was the Vice-Chair of the Insurance Law Section of the Canadian Bar Association of Ontario. He is a member of The Advocates' Society and the Association of Trial Lawyers of America.

Vincent is fluent in English and Italian.

DOUGLAS LENNOX is a tax partner at the law firm Rochon Genova in Toronto. Douglas graduated with a J.D. from the University of Toronto Law School (1996) and was admitted to the Ontario Bar (1998). He represents plaintiffs in class actions, product liability matters and antitrust suits. Much of his work focuses on personal injury and property loss claims against the tobacco industry.

He recently became the first lawyer in Canadian legal history to conduct a personal injury trial against the tobacco industry. Shortly thereafter, he brought a constitutional challenge against the government of Ontario for refusing to allow contingency fees. He is also working on class actions involving toxic exposure to anorectic diet drugs, cholesterol-lowering statin drugs and heartburn

drugs. Douglas has written several articles on class actions and also on tobacco litigation and regularly lectures on product liability and class actions at conferences.

Lindsay Lorimer

LINDSAY LORIMER is a tax partner with the firm. Lindsay graduated from Dalhousie University (1998) and was admitted to the Ontario Bar (2000). Before joining Rochon Genova in January 2001, Lindsay was an associate at a large downtown firm. She now represents plaintiffs in various class actions and in employment law (wrongful dismissal), personal injury, motor vehicle, institutional abuse and commercial litigation matters.

Lindsay co-authored papers in 1999 and 2000 on the "Liability of Consultants and Design Professionals". She has also appeared on two reported cases: *Edper Brascan v. Labatts* and *Paula MacDonald v. Dufferin Peel et al.* (toxic mould in school portables).